

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

JOAN RUGGIERO,

Defendant

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Case No. 1:13-CR-10252-WGY

ASSENTED TO MOTION TO CONTINUE SENTENCING DATE

NOW COMES the Defendant Joan Ruggiero, by and through undersigned counsel and respectfully requests this Court continue the sentencing date from March 12, 2015 to September, 2015 or another date convenient for the Court. As reasons therefore, the Defendant states as follows:

1. Joan Ruggiero has pled guilty to one count of conspiracy to commit wire fraud in violation of 18 U.S.C. §§ 371 & 1343, and the matter is currently scheduled for sentencing in this Court on March 12, 2015;

2. Ms. Ruggiero has a cooperation provision in her plea agreement dated August 27, 2013, and her cooperation relates primarily to another criminal case pending in the District of Massachusetts which has been scheduled for trial on June 1, 2015 before the Honorable Richard G. Stearns. It is anticipated that the trial in that matter will last for 3-4 weeks;

3. Allowing the defendant to testify prior to any sentencing hearing in this matter would be more efficient as it would allow potential cooperation to be effectuated prior to the sentencing recommendation and imposition;

4. Counsel for the Defendant anticipates that he will be unavailable in July 2015 and requests a sentencing date in September 2015. The Assistant United States Attorney in this matter, Eric P. Christofferson, expressly assents to this motion.

JOAN RUGGIERO

By her attorney,

/s/Raymond Sayeg
Raymond Sayeg, Esq.
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(BBO NO. 555437)

Dated: January 16, 2015

CERTIFICATE OF SERVICE

I, Raymond Sayeg, hereby certify that a copy of this document will be sent to counsel for the United States via electronic mail.

Dated: January 16, 2015

/s/Raymond Sayeg
Raymond Sayeg